

# SHER TREMONTE LLP

November 13, 2024

## **BY ECF**

The Honorable Katherine Polk Failla  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re:    *Richard v. Combs et al.*, 24-cv-06848**

Dear Judge Failla:

We write on behalf of our clients, Sean Combs, Daddy's House Recordings, Inc. (incorrectly sued as Daddy's House Recording Studio), Bad Boy Entertainment LLC, Bad Boy Records LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., 1169 Corp. f/k/a Sean Combs Music Inc. (incorrectly sued as The Sean Comb Music Inc.), Sean Combs Capital LLC, CE OpCo, LLC f/k/a Combs Enterprises LLC (incorrectly sued as Combs Enterprises LLC),<sup>1</sup> Combs Wines and Spirits LLC, Janice Combs Publishing LLC (incorrectly sued as Janice Combs Publishing Inc.), Janice Combs Publishing Holdings, Inc., and Love Records, Inc (together, the "Combs Defendants") in the above-referenced case. Pursuant to Rule 2C(i) of the Court's Individual Rules and Practices, and in light of multiple scheduling conflicts, the undersigned respectfully seeks to adjourn the deadline for the Combs Defendants to answer or otherwise respond to the Complaint until January 22, 2025. Plaintiff's counsel consents to this request.

For Defendants CE OpCO, LLC f/k/a Combs Enterprises LLC (incorrectly sued as Combs Enterprises LLC), Love Records, Inc., Bad Boy Entertainment Holdings, Inc., Bad Boy Records LLC, Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Sean Combs Capital LLC, Combs Wines and Spirits LLC, Janice Combs Publishing LLC and Janice Combs Publishing Holdings, Inc., this is the second request for an extension of time to respond to the Complaint. (ECF Nos. 61-62). For the remaining Combs Defendants, this is the first such request. The current deadline for the Defendants CE OpCO, LLC, Love Records, Inc., Bad Boy Entertainment Holdings, Inc., Bad Boy Records LLC, Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Sean Combs Capital LLC, Combs Wines and Spirits LLC, Janice Combs Publishing LLC, Janice Combs Publishing

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<sup>1</sup> On October 9, 2024, the undersigned counsel entered an appearance for Combs Enterprise LLC, among other entities. (ECF Nos. 59-60). For the record, we wish to clarify that the entity previously known as Combs Enterprise LLC now operates under the name CE OpCO LLC.

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Holdings, Inc., Bad Boy Entertainment LLC, 1169 Corp. f/k/a Sean Combs Music Inc. (incorrectly sued as The Sean Comb Music Inc.), and Daddy's House Recording, Inc. (incorrectly sued as Daddy's House Recording Studio) to answer or otherwise respond to the Complaint is November 20, 2024.

We have met and conferred with counsel for Plaintiff who have agreed to extend the time for all the Combs Defendants to answer or otherwise respond to the Complaint to January 22, 2025.

Respectfully submitted,

*/s/ Erica A. Wolff*

Erica A. Wolff  
Michael Tremonte

cc: All Counsel of Record via ECF